

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

State of Minnesota, by its
Attorney General Lori Swanson,

Civil File No. 12-145 RHK/JJK

Plaintiff,

v.

AFFIDAVIT OF TIMOTHY PALM

Accretive Health, Inc.,

Defendant.

Timothy Palm, being first duly sworn on oath, state as follows:

1. My name is Timothy Palm. I grew up in North Dakota. I attended college in Moorhead. I now live in Edina, Minnesota. I am 27 years old, and I am employed as an accountant. I have insurance coverage with HealthPartners.

2. Late one night in the spring of 2011, I began to experience terrible pain in my abdomen. I was nauseous. The pain continued to get worse to the point that it became unbearable. Around 2:00 a.m., I checked in at the Fairview Southdale Emergency Room. While in the Emergency Room, my pain increased in severity. It was the worst pain I had ever experienced in my life. In the midst of various tests being run, and before I was diagnosed, a collector entered the patient room while I was lying on the bed in a gown. My wallet was in my coat across the room. An unexpected and lengthy delay in my treatment occurred because the man forced me to hold a conversation about payment for my visit, even though almost no treatment had been administered. He asked me to pay \$800. This was quite discomforting, but I begrudgingly proceeded to instruct

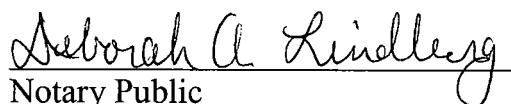
the collections person, from my emergency room bed, where my coat was, which pocket my wallet was in, and which HSA card he could pull out of my wallet and scan for an upfront payment. His eyes lit up when he heard that I would let him scan my HSA card to debit the payment. I was in so much pain, and so scared about what was wrong with me, that I would have done anything asked of me at that point in time in order to make the pain go away and receive the treatment I urgently needed. My understanding was that I would not get treatment if I didn't pay.

3. After I paid, the man left the room. The medical providers then continued to perform tests on me. The doctor thereafter determined that I had appendicitis and advised me that my appendix was about to burst. The doctors immediately whisked me into surgery, put me under general anesthesia, and removed my appendix. If not treated, an inflamed appendix can burst and can be fatal. It is very disconcerting that my diagnosis was delayed by the visit with the collections man. I feel fortunate that my appendix did not burst while I waited.



TIMOTHY PALM

Subscribed and sworn to before me
this 3rd day of May,
2012.


Notary Public